



"Carl.E..Walter"@fakeaddress.net on 09/20/2001 01:04:43 PM

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To: ser@notes.ymp.gov, bonnie.fogdall@notes.ymp.gov
CC:

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IP address: 128.115.102.144

---> Commentors Name: Carl E. Walter
---> Organization: LLNL
---> Position: Engineer-at-large, emeritus

---> The Commentors Address:
---> 7000 East Avenue
---> Livermore, California 94550

---> Email Information:
---> walter3@llnl.gov
---> Add commentor to the mailing list : yes

---> Contact Information:
---> fax number : -
---> phone number : -
---> organization : LLNL
---> position : Engineer-at-large, emeritus

---> Comment Text :
It appears to me that all of the information that has been obtained on the Yucca Mountain site at a huge cost, ~\$7B, over an excessively long time, decades, is positive in terms of its technical suitability as a geologic repository for radioactive material. On a technical basis, the site is suitable, and construction of the necessary tunnels should proceed in a timely fashion.

What is wrong with the Yucca Mountain site, however, is the context in which the program is being carried out and the multiplicity of organizations involved in its execution. Below are some program corrections that must be made:

1. The site should be designed to accommodate only used fuel from U.S. power reactors. The intention is that 90% of the radioactive material mass is to be this used fuel. Much of the small amount, 10%, of miscellaneous material intended for the site is truly waste from military operations, and difficult

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to modify to achieve shorter term radioactive life. This introduces an unnecessary complication in site specifications, as the miscellaneous material is to be stored in perpetuity, but the used fuel will only be stored for a short while (site plans provide for recovery of used fuel within 100 years) and will eventually be recycled in power reactors. Recycling the used fuel is the only technical solution that makes sense. On an energy basis, the so-called spent fuel intended for 90% of the site is not spent, only slightly (~3%) used.

2. As stated, the Federal government is responsible for disposition of used fuel. This has been confirmed in appeal court. The Federal government is stonewalling the law and the court ruling that determined that the Federal government must assume management of the used fuel by January 1998. The Federal government should exercise its right of eminent domain and begin at once to move the used fuel to its Nevada Test Site adjoining Yucca Mountain. The Federal government should not have to license the Yucca Mountain site. It is not a commercial facility. The DOE is the appropriate Federal agency to execute the repository program. NRC and EPA involvement should only be of a consulting nature, if desired by DOE. Nevada State government should be excluded by the Federal government's right of eminent domain.

With these corrections, the used fuel problem that is threatening expanded use of nuclear power in our United States and the nuclear power contribution to national energy independence, would be greatly alleviated. Disposition of the miscellaneous radioactive material should be considered in the context of a separate site. This will facilitate also the accounting for expenditures, now generally being paid for by the ratepayers of the utilities that generated the used fuel.

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